



PARKER McCAY

Parker McCay P.A.
9000 Midlantic Drive, Suite 300
P.O. Box 5054
Mount Laurel, New Jersey 08054-5054

P: 856.596.8900
F: 856.596.9631
www.parkermccay.com

Harris Neal Feldman
Litigation Department, Chair
P: 856-810-5854
F: 856-494-1706
hfeldman@parkermccay.com

April 2, 2025

VIA CM/ECF

Honorable Justin T. Quinn, U.S.M.J.
U.S. District Court – District of New Jersey
402 East State Street
Trenton, New Jersey 08608

IT IS SO ORDERED
this 9th day of April 2025

Hon. Justin T. Quinn, U.S.M.J.

Re: *Karmin v. Rogove, et al.*
Civ. No.: 3:25-cv-01036-GC-JTQ

Dear Judge Quinn:

This firm was recently retained by Defendant Alabama Association of Paralegals, Inc. (AAPi) in this action filed by *Pro Se* Plaintiff, Alan Karmin. Plaintiff alleges in his March 27, 2025 Motion for Alternate Service that “[a]ll Defendants were sent the summons and complaint by certified mail, return receipt requested” and that AAPi signed for the certified mail [ECF No. 8-1, ¶ 13]. Plaintiff has not filed a Return of Service and it does not appear at this time that service upon AAPi was properly effectuated under Fed. R. Civ. P. 4. Indeed, in a February 27, 2025 Letter Order [ECF No. 7], the Court previously denied Plaintiff’s February 21, 2025 letter request to serve out of state Defendants “via the United States Postal Service” [ECF No. 6].

Nonetheless, because Plaintiff alleges that his certified mail was delivered to AAPi on or about March 12, 2025, if it is determined that this was proper service, AAPi’s response to Plaintiff’s First Amended Complaint [ECF No. 5] would be due on or around April 2, 2025. This office is continuing to investigate this matter and respectfully requests a brief extension until April 25, 2025 to answer, move, or otherwise reply, which is only slightly longer than an extension under L. Civ. R. 6.1(b). I note that the Court recently granted this same extension to Defendant Carolina Academic Press [ECF No. 11]. AAPi has not sought or obtained any other extension, and this request will not unduly delay this matter or prejudice any party.

The Court’s consideration is greatly appreciated.

Respectfully submitted,

/s/ Harris Neal Feldman
HARRIS NEAL FELDMAN, ESQ.

cc: Alan Karmin (via regular mail)
All Counsel of Record (via CM/ECF)
4899-0249-2720, v. 1

COUNSEL WHEN IT MATTERS.SM

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